

GILBERT R. GEILIM, ESQ., SBN: 117508
GILBERT R. GEILIM, A PROFESSIONAL LAW CORP.
4929 Wilshire Blvd., Suite 825
Los Angeles, CA 90010
Telephone: (323) 937-5555
Facsimile: (323) 937-4551

Attorney for Defendant,
KAREN BREDICE

FILED

AUG 22 2005

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY
DEPUTY CLERK

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KAREN BREDICE,

Defendant.

Case Number: CR S-03-148 GEB

**STIPULATION FOR ORDER (1) ISSUING
SUBPOENA *DUCES TECUM* UNDER RULE
17(c) TO S.A.B. MEDICAL GROUP, INC.
AND FRANK BREDICE, D.C.; (2)
DIRECTING THAT PRODUCTION BE
MADE PRIOR TO TRIAL DATE**

Date: _____, 2005
Time: _____
Dept.: Courtroom 10

HONORABLE JUDGE GARLAND E.
BURRELL, JR.

TO ALL PARTIES HEREIN AND THEIR ATTORNEYS OF RECORD AND TO THE
ABOVE-ENTITLED COURT:

PLAINTIFF AND DEFENDANT HEREBY STIPULATE AND AGREE, after reviewing the
EX PARTE APPLICATION BY DEFENDANT KAREN BREDICE FOR ORDER (1) ISSUING
SUBPOENA *DUCES TECUM* UNDER RULE 17(c) TO S.A.B. MEDICAL GROUP, INC. AND
FRANK BREDICE, D.C.; (2) DIRECTING THAT PRODUCTION BE MADE PRIOR TO TRIAL
DATE; MEMORANDUM OF POINTS AND AUTHORITIES AND DECLARATION OF COUNSEL;
[PROPOSED] ORDER filed by Defendant Karen Bredice, that a subpoena *duces tecum* under Rule
17(c) should be directed to S.A.B. Medical Group, Inc. and Frank Bredice, D.C. for the production the
complete patient files of S.A.B. Medical Group, Inc. for the period of January 1998 through September

1 2000, including all billings statements and fee slips, for inspection by both the prosecution and the
2 defense in this matter.

3 Dated: August ____, 2005

Respectfully Submitted,
GILBERT R. GEILIM.
A PROFESSIONAL LAW CORP.

4 /s/

6 BY: GILBERT R. GEILIM, ESQ.,
Attorney for Defendant,
KAREN BREDICE

9 DATED: August ____, 2005

U. S. ATTORNEY'S OFFICE

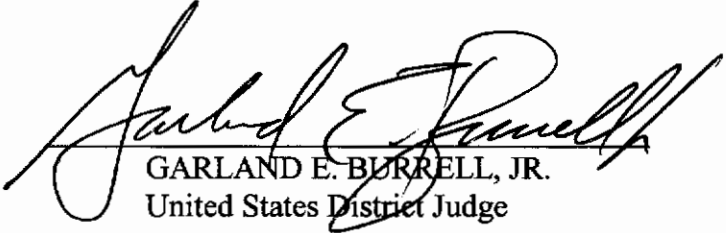
10 /s/

11 BY: DANIEL S. LINHARDT,
Assistant United States Attorney

14 Based on the parties' Stipulation filed August 12,
15 2005, and consistent with Defendant's proposed Order concerning
16 the subject documents, S.A.B. Medical Group, Inc., and Frank
17 Bredice, D.C., are to provide the subject documents to Cathleen
18 A. Connolly, Special Agent, Federal Bureau of Investigation,
19 11000 Wilshire Blvd., Suite 1700, Los Angeles, CA 90024, no later
20 than September 23, 2005.
21

22 IT IS SO ORDERED.

24 DATED: August 18, 2005


GARLAND E. BURRELL, JR.
United States District Judge